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23 Attorneys for Plaintiff

24 **UNITED STATES DISTRICT COURT**  
25 **DISTRICT OF NEVADA**

26 NAVAJO HEALTH FOUNDATION – SAGE  
27 MEMORIAL HOSPITAL, INC. (doing  
28 business as “Sage Memorial Hospital”); an  
Arizona non-profit corporation,

Plaintiff,

vs.

RAZAGHI DEVELOPMENT COMPANY,  
LLC; a Nevada limited liability company  
(doing business as “Razaghi Healthcare”),  
AHMAD R. RAZAGHI; individually, TAUSIF  
HASAN; individually, DOES 1-10;

Defendants.

Case No. 2:19-cv-0329-GMN-EJY

**JOINT STIPULATION TO EXTEND  
THE PARTIES’ TIME TO SUBMIT A  
PROPOSED DISCOVERY PLAN AND  
FOR PLAINTIFF TO RESPOND TO  
DEFENDANTS’ MOTION TO STAY  
DISCOVERY AND FOR RULE 11  
SANCTIONS**

**(SECOND REQUEST)**

Pursuant to Federal Rule of Civil Procedure (“FRCP”) 6 and the Court’s Local Rule of Civil Practice 7-1, the parties hereby stipulate, subject to the Court’s approval, to permit Plaintiff additional time, to and until April 8, 2022, to respond to Defendant’s motion to stay discovery (ECF No. 170) and to their FRCP 11 sanctions motion (ECF No. 174). Presently, Plaintiff’s responses to the referenced motions are due on April 1, 2022. This is the parties’ second request for extension of time related to the above-referenced motions. In addition to the foregoing, the parties also stipulate to permit the filing of a proposed discovery plan 14-days after Plaintiff files the amended complaint discussed in the Court’s Order of March 30, 2022 (ECF 178).

In support of this Stipulation, the parties agree to the following:

1. Good cause exists to support this request for additional time. The parties have discussed the pending motions and are in agreement that good cause exists to support the extension. Additionally, the parties having recently conducted a case conference meeting have been working on a proposed discovery plan but need additional time to coordinate its filing. During all of the foregoing, counsel for Plaintiff (Paul S. Padda) was required to travel out of town for depositions in another case and became ill upon his return. Plaintiff’s counsel, Kathleen Bliss, has also been ill and only able to work on a limited schedule. Counsel for the respective parties have communicated regarding these issues and they are all in agreement that the requested extension of time is appropriate and supported by good cause.

2. Counsel for the respective parties have communicated regarding this Stipulation and agree that an extension of time to permit the following is appropriate:

- a. Plaintiff shall respond to the motion to stay discovery on or before April 8, 2022.
- b. Plaintiff shall respond to the motion for FRCP 11 sanctions on or before April 8, 2022.
- c. The parties shall submit a proposed discovery plan to the Court within 14-days after the Plaintiff has filed an amended complaint (*see* ECF 178).

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1 The parties respectfully request the Court approve this Stipulation.

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3 /s/ Kris Leonhardt

/s/ Paul S. Padda

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Pavneet S. Uppal, Esq.  
5 Kris Leonhardt, Esq.  
Jeffrey D. Winchester, Esq  
6 *Counsel for all named Defendants*

\_\_\_\_\_  
Kathleen Bliss, Esq.  
Paul S. Padda, Esq.  
David Stander, Esq.  
Douglass A. Mitchell, Esq.  
*Counsel for Plaintiff,  
Counterdefendant and Third-Party  
Defendants*

7 Dated: March 31, 2022

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9 Dated: March 31, 2022

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11 **IT IS SO ORDERED:**

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14 **UNITED STATES MAGISTRATE JUDGE**

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16 **DATED: April 1, 2022**  
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